

Frankie
Hampton

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March 25, 2015

Via email, addressed to: fhampton@fec.gov

Federal Election Commission
Office of Complaints Examination
and Legal Administration
999 E Street, NW
Washington, DC 20436

Attn: Frankie Hampton, Paralegal

Re: MUR 6916

Dear Ms. Hampton:

This letter will confirm our telephone conversation of March 25, 2015, when I advised I am the Treasurer of Friends of Houghton for Congress ("FHC") and that, on behalf of that political campaign, I stated our wish to preserve the rights of FHC in the pending investigation in the complaint filed by Foundation for Accountability and Civic Trust ("FACT"). I also indicated that I only received a copy of the Complaint this current week when I received the copy the FEC forwarded to the PO Box of the Campaign, and an identical copy from FACT itself.

Following this cover is the Statement of Designation of Counsel which we request be entered in the record. I also request a copy be transmitted to the Office of General Counsel along with a copy of this letter as well.

Please accept this letter as our demonstration that no action should be taken against Friends of Houghton for Congress on account of any of the allegations of FACT.

First, neither FHC, its supported candidate, Thomas Houghton, nor I, as Treasurer have had any role in and/or knowledge about the creation of a for-profit business as alleged by FACT;

Second, I, as Treasurer of FHC, reported all transactions known to me, whether in cash or in-kind, and that no such contributions ever came to FHC by either Catalist, LLC; NGP-VAN, LLC; the Democratic National Committee; the Democratic Congressional Campaign Committee; nor any of the other Respondents or their agents as listed in the FACT Complaint; and, in no event did FHC engage in any coordination of its fund-raising efforts with any other Respondent named in this matter;

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Third, FHC never engaged in making or receiving the benefit of any independent expenditure by any respondent corporations or any other contributors;

Fourth, FHC acted at all times within the scope of the Federal Election Campaign Act of 1971, as amended, and never operated in any non-profit company as alleged; nor was FHC ever established by, financed by, maintained by or controlled by the Democratic National Committee of any of its subsidiary entities which FACT claims to exist; and

Finally, at all times relevant hereto, FHC operated at arm's length with NGP VAN, LLC, and neither the candidate, the Campaign Manager, nor I, as Treasurer have any knowledge whatsoever of any of the allegations made by Fact in this matter.

We request, therefore, that any and all allegations against Friends of Houghton for Congress be dismissed with prejudice.

Very truly yours,



Gregory Paulson
Treasurer and Counsel to
Friends of Houghton for Congress

I, GREGORY PAULSON, Treasurer of Friends of Houghton for Congress verify that the statements made in this communication are true and correct to the best of my knowledge, information and belief. I understand that false statements herein are made subject to the penalties of perjury.


Gregory Paulson, Treasurer